

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

PS KIDS LLC,)	
)	
Plaintiff,)	
)	
v.)	No.14SL-CC00185
)	
PAYMASTER BUSINESS SERVICES,)	Division No.19
INC., et al.)	
)	
Defendants)	

PLAINTIFF'S MOTION FOR INTERLOCUTORY ORDER OF DEFAULT

COMES NOW Plaintiff, PS Kids LLC, by and through undersigned counsel, and for its Motion for Interlocutory Order of Default against Paymaster Business Services, Inc., Paymaster Business Solutions, Inc., Paymaster Payroll Services, Inc. and Brad Ferguson pursuant to Rule 74.05(b) states:

1. Plaintiff served Defendants Paymaster Business Services, Inc., Paymaster Business Solutions, Inc., Paymaster Payroll Services, Inc. and Brad Ferguson on August 12, 2014 with its Petition. Return of service was filed with this Court on August 19, 2014.
2. More than thirty (30) days have elapsed since these Defendants were served and these Defendants have in no way responded to the Petition.
3. Due to Defendants' failure to respond to the Petition within the time provided by law, Plaintiff is entitled to an interlocutory order of default against these Defendants.

WHEREFORE Plaintiff, PS Kids LLC, prays this Court enter its Order finding Defendants Paymaster Business Services, Inc., Paymaster Business Solutions, Inc., Paymaster Payroll Services, Inc. and Brad Ferguson in default and for such other and further relief as this Court deems just and proper.

WILLIAMS VENKER & SANDERS, LLC

By /s/ Michael Hunter
Michael Hunter, #45097
100 North Broadway, 21st Floor
St. Louis, Missouri 63102
314/345-5000
314/345-5055 (FAX)

ATTORNEYS FOR PLAINTIFF
PS KIDS LLC

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the above was filed and served on October 15, 2014, to all counsel of record through the court's electronic filing system.

Joe D. Jacobson, Esq.
Green Jacobson, P.C.
7733 Forsyth Blvd., Suite 700
Clayton, Missouri 63105
jacobson@stlouislaw.com
(314) 862-1606 FAX
Attorneys for Defendant TCE Global, Inc.

T. Michael Ward, Esq.
Teresa M. Young, Esq.
Brown & James, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101
mward@bjpc.com
tyoung@bjpc.com
(314) 421-3128 FAX
Attorneys for Defendant MPAY, Inc.

And mailed, US First Class, Postage Prepaid to:

Brad Ferguson
560 Falling Leaf Lane
Washington, Missouri 63090
Defendant and registered agent for Paymaster Defendants.

/s/ Michael Hunter